

CC Docket No. 94-102 – Status Report

Filed by: Keystone Wireless, L.L.C.
Jim Chandler, Operations Manager
c/o Keystone Wireless, LLC
dba Immix Wireless
53 Warwick Street
Boyertown, PA 19512

Date: August 1, 2008

To: Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

By Electronic Submission:

Jim Schlichting, Acting Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Kris Monteith, Chief
Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

STATUS REPORT
August, 2008
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Keystone Wireless, L.L.C. ("Keystone") hereby submits its E911 Status Report, pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver of Deadlines for Implementation of Phase II E911 of Key Communications, LLC and Keystone Wireless, LLC*, CC Docket No. 94-102, *Order*, 20 FCC Rcd 16927 ¶19 (2005).

Carrier Identifying Information:

Carrier Name: Keystone Wireless, L.L.C. – FRN 0007 4157 06

E911 Compliance Officer: Paul Snyder
c/o Keystone Wireless, LLC
dba Immix Wireless
53 Warwick Street
Boyertown, PA 19512
psnyder@pcmgt.com

Information Regarding PSAPs:

Keystone has received Phase I and/or Phase II requests from all nine of the PSAPs in its market, and has completed installation of its Phase I deployments in eight of the nine counties in its market. Keystone is still in the process of completing its Phase I installation in Union County. Deployment is contingent on delivery of the T-1 lines, which are scheduled for delivery August 1, 2008. Testing will be completed shortly after the T-1s are connected to the selective routers. Keystone anticipates that the Phase I deployment in that county will be complete by the end of the first week in August. Once the Phase I installation in Union County is complete, all of the Phase I installations in Keystone's market will be using NCAS solutions and Intrado as the central hub, which is a requirement for moving to the Phase II E-911 deployment.

Keystone and Essential Management Services, LLC ("EMS"), Keystone's liaison with the various PSAPs and the State of Pennsylvania, continue to maintain regular contact with the PSAPs and to provide them with information on the status of Keystone's Phase II E-911 deployment. EMS continues to attend the monthly Public Safety Regional Meetings, where it discusses E-911 matters with the PSAPs on behalf of Keystone. To date, neither the Pennsylvania Emergency Management Agency ("PEMA"), which is the agency responsible for overseeing Phase I and Phase II E-911 deployment by all state PSAPs, nor any PSAP has expressed any concerns or issues with respect to Keystone's Phase II E-911 implementation efforts.

EMS also continues to work with PEMA regarding Keystone's Wireless 9-1-1 Cost Recovery Plan ("CRP"), which was initially submitted to PEMA in March of 2007. As previously reported, Keystone, with EMS' assistance, submitted a revised 2007/2008 CRP to PEMA in November 2007, and on March 1, 2008, submitted another report on potential Phase II solutions for its market (CPR 2008/2009). PEMA granted partial approval of Keystone's 2008/2009 CRP. Keystone appealed that ruling requesting full funding, however PEMA denied the appeal. Further PEMA has now informed Keystone that although the CPR 2008/2009 was approved for approximately \$2.65 million, funds to support the plan will not be available to wireless carriers in this fiscal year (all funds having been committed to PSAP's). Funding will therefore be pending the availability of funds in fiscal 2009/2010. EMS is continuing to assist Keystone with its communications with the PEMA and with keeping the PSAPs in Keystone's market advised of the status of the PEMA funding for Keystone's Phase II deployment.

Implementation of Phase II Service:

As previously reported, Keystone has been working on a Phase II E-911 solution with a leading manufacturer of network based solutions – Polaris Wireless. They conducted a preliminary study of Keystone's market to ascertain the most effective network-based solution for the market, and the results of this study and the correlating expense estimates were subsequently incorporated into Keystone's 2008/2009 CRP. Also, Keystone has taken preliminary steps in the process of negotiating a contract for this Phase II solution, but has temporarily postponed final negotiations -- Keystone cannot enter into a contract until PEMA makes a commitment respecting the funding for Keystone's Phase II deployment. Upon receipt of a commitment of funds from the PEMA and the execution of a definitive agreement with the manufacturer of the Phase II solution, Keystone will be able to schedule a final market study, which will determine the exact Phase II solution to be deployed in Keystone's market. Keystone hopes to be able to commence Phase II deployment late in the first quarter of 2009.

Even when Keystone implements the network-based Phase II E-911 solution, which utilizes triangulation techniques, it will not reach the requisite 67% and 95% accuracy requirements prescribed by §20.18(h)(1) or (2) of the Commission's rules at the PSAP level in all parts of the licensed area, because only a portion of Keystone's service area is susceptible to triangulation techniques. Keystone's service area is very rural or less densely populated and the cell sites are spread far apart. However, Keystone expects to meet the Commission's requirements in the core population areas of the market. Thus, Keystone probably will have to file a request with the Commission for a waiver of these accuracy standards until such time as there are further technological advancements in this field allowing for full compliance with §20.18(h) of the rules.

Construction of New Cells and Expansion of Coverage:

Since its last Status Report, Keystone has not constructed any new cell sites nor upgraded any existing cell sites in its market. Keystone is in the process of making preparations to construct two new cells in its market, which will provide coverage to areas of its market not currently covered. Keystone anticipates completion of these new cell sites by the fourth quarter of 2008.